



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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Final

Memphis Depot

BRAC Cleanup Team

Meeting Minutes

16 November 2006

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Previous Meeting Minutes

The BRAC Cleanup Team (BCT) approved and signed the minutes from the 19 October 2006 meeting.

Dunn Field Source Areas Remedial Design (SARD)

Mr. Perlmutter reported that CH2M Hill had received and reviewed EPA and TDEC comments on the 90% SARD. He identified the following issues that resulted from the comments:

- Impact on the SARD from the conversion of the Permeable Reactive Barrier (PRB) from Zero-Valent Iron (ZVI) to biological treatment;
- Construction/sampling sequencing;
- Fluvial Soil Vapor Extraction (SVE) operation/duration;

- Potential for presence of buried metal objects at Dunn Field and effect on loess thermal system;
- Remedial Action (RA) Soil Sampling;
- Thermal comments;
- Effect of Off Depot bio-barrier on the SARD.

Mr. Perlmutter indicated that CH2M Hill believed that changing the off-Depot remedy from the ZVI PRB to an Enhanced Bioremediation Treatment (EBT) barrier (bio-barrier) would not affect the Source Areas remedy. He said that the bio-barrier would serve the same purpose as the ZVI PRB as it would intercept and treat the plume. And, the use of EBT would enable injections at multiple locations within the contaminant plume that would accelerate treatment.

Mr. Ballard indicated that it was hard to envision how the bio-barrier would treat the contamination without seeing the constituent contour lines. He asked if the bio-barrier would have the same alignment. Mr. Perlmutter responded that the concept was for the bio-barrier to transect the plume and to supplement treatment in the hot spots.

Mr. Ballard indicated that the off-Depot remedy must be compatible with and meet the Dunn Field ROD Remedial action objectives. He also commented that the SARD should state that the off-Depot remedy would meet the objectives of the remedy: to treat contamination levels that exceed 50 ppb in the off-Depot plume and to allow levels less than 50 ppb to go around the treatment areas and be reduced by Monitored Natural Attenuation (MNA). The Off-Depot Groundwater RD must contain a section stating that the original ROD called for a ZVI PRB and then describe the decision making process that resulted in the bio-barrier PRB.

The team then discussed the sequencing of groundwater sampling during the loess thermal treatment. Mr. Perlmutter explained that CH2M Hill planned to complete the final round of baseline groundwater sampling just before the soil remedy started, and then abandon wells (12 of 26) within the thermal treatment areas. The loess thermal treatment system would operate for about one year, and then new wells would be installed and the groundwater sampling approach that would provide the basis for the final ZVI injections would resume.

Mr. Perlmutter indicated that sampling would not be needed during system operation because the loess thermal system remedial goals (RGs) were for the soil, not the groundwater. CH2M Hill did not expect an instant response in groundwater, so the sampling data would not be useful. Also, since the sample results would be used to determine the sizes and locations of the ZVI treatment areas then it was logical to allow the system to run its full course in order to reduce the size of the ZVI treatment areas as much as possible.

Mr. Spann asked why CH2M Hill did not install wells before the construction/operation of the loess thermal system rather than after. Mr. Holmes responded that since the wells would not provide additional useful information why install them before as they could be standard PVC wells if installed after operation of the thermal system.

Mr. Spann indicated that it would be good to understand the effect of the Source Areas remedy on groundwater and thusly on the off-Depot groundwater activities. Mr. Perlmutter and Mr. Holmes explained that there were other wells in the area that could provide data. Mr. Perlmutter indicated that some of the new wells would be installed in the same locations, but some may be shifted a little.

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Mr. Ballard interjected that if the wells were installed earlier, then groundwater sampling could start during the year of loess thermal system operation rather than waiting until the end of that year, which could help start the ZVI injections sooner and maybe achieve Operating Properly and Successfully (OPS) sooner. He suggested that if groundwater samples were collected during operation of the loess thermal system then it might provide sufficient data to support OPS onsite and allow for property transfer, basically bifurcating the OPS determination between the onsite and off-site remedies. Once the last element of the Source Areas remedy was in place (i.e., ZVI injections) and with sufficient data, DLA could apply for the OPS determination for the onsite remedy.

Mr. Spann opined that if groundwater samples were collected during operation of the loess thermal system, then ZVI injections could start a month or so after turning off the loess thermal system. Mr. Ballard said that monitoring during the loess thermal operation may also resolve the question of a dense non-aqueous phase liquid (DNAPL) source in the loess. If the soil cleanup did not affect groundwater concentrations, then it could indicate a DNAPL source in the groundwater.

Mr. Holmes responded that the assumption used for the Master Schedule was to conduct two groundwater sampling events after turning off the loess thermal treatment before starting the onsite ZVI injections, which would only take about six months. Mr. Ballard continued that sampling during operation of the loess thermal system would establish a trend on how the treatment was working.

Mr. Sprinkle suggested performing one round of sampling after completing the loess thermal system then making the decision about the location of the 1000 ppb contour and about starting the ZVI injections. Mr. Ballard indicated Mr. Sprinkle's suggestion would be acceptable, but that he had heard today plans for several rounds of sampling ranging from two to four quarters after completing the loess thermal treatment before determining the ZVI treatment areas. Mr. Perlmutter explained that the thought was to allow the fluvial SVE system to continue removing contaminants within the saturated zone thereby shrinking the ZVI treatment areas even further in order to save ZVI costs.

Mr. Spann interjected that this brought back the question of when the team wanted to reach OPS and that monitoring groundwater during loess operation provided a good metric on how the loess was reacting. He did not understand why the sampling points that would be used throughout the RA should not be installed sooner rather than later. Mr. Perlmutter responded that there were already so many holes in the ground that he had concerns about additional holes affecting operation of the remedies and about the added expense of stainless steel well casings vs. PVC casings. He suggested developing a metric to help guide the team in making the decision about where and when to start the ZVI injections. Mr. Ballard said he and Mr. Spann needed to discuss the issue in order to determine the contamination levels that would initiate implementation of the ZVI injections.

Mr. Sprinkle asked why waiting to start the ZVI injections was so important. Mr. Miller responded that the idea was to wait and see the impact of the remedies on the flux of contamination to groundwater. It would take a period of time to determine with confidence that there was not a DNAPL source. If groundwater responded favorably, then less ZVI would be necessary decreasing remedy costs. Mr. Ballard reiterated that the important aspect of the Source Areas remedy was interrupting the flux of contaminants from the unsaturated to the saturated zone, which the loess thermal system should accomplish.

Mr. Holmes said that the standard practice for well abandonment was to remove the surface completion and fill the well with grout leaving the PVC pipe. He also indicated that the PVC could melt and questioned if that was an issue for the team. Mr. Spann voiced concern about the potential release of contaminants from the heated PVC. Mr. Ballard agreed to contact Ms. Eva Davis of the EPA Office of Research and Development (ORD) about the poly vinyl chloride (PVC) pipe reaction to thermal treatment and to discuss his findings with Mr. Spann.

The BCT agreed that the sequence would be to abandon the PVC wells and install new wells during construction of the fluvial SVE system; to collect baseline samples from the existing wells; to collect samples after the start of loess thermal system operations (somewhere between six months to one year after start of operation); and, depending on the response, to either continue with more sampling to monitor results or, if no appreciable change, go directly to ZVI injections.

AI: CH2M Hill to propose a metric forming the basis for the following sequence decision and to modify the SARD accordingly: abandon the PVC wells and install new wells before the loess treatment; to collect baseline samples from the newly installed wells; to collect samples after the start of loess operations (somewhere between six months to one year after start of operation); and, depending on the response, to either continue with more sampling to monitor results or, if no appreciable change, go directly to ZVI injections.

AI: Mr. Ballard to contact Ms. Eva Davis from EPA ORD about PVC pipe reaction to the loess thermal treatment and to provide information to the team.

Mr. Spann asked about the off-Depot EBT sequence compared with the loess thermal treatment and if the Off-Depot Groundwater RD would include a mechanism to adjust the EBT locations based upon the changes in flux from the loess, since the source may be eliminated during the Source Areas treatment. Mr. Perlmutter responded that the Off-Depot Groundwater RD would be flexible to allow changes to EBT locations as needed. Mr. Holmes interjected that off-Depot groundwater monitoring would continue throughout operation of the Source Areas RA.

Mr. Spann asked if sampling during the loess operation would help form the basis for the EBT parameters. Mr. Perlmutter responded that regardless of the contamination concentrations coming off of Dunn Field the off-Depot groundwater conditions must be anaerobic, so the EBT would proceed in order to create favorable conditions.

The team then discussed EPA ORD comments on the operation and duration of the fluvial SVE system. EPA ORD had concerns about the effectiveness of the fluvial SVE including the time necessary to meet 1,1,2,2 Tetrachloroethane (PCA) RGs as there were some inconsistencies in the treatability study results. The results indicated the PCA was removed, but there were also non-detect sample results. Mr. Perlmutter reported he used the detection results to prepare the scenarios in the Source Areas RD that predicted the length of time for PCA to reach the RG.

EPA ORD recommended using thermally-enhanced SVE down to the fluvial aquifer, at least in the higher concentration areas. Mr. Perlmutter indicated that this would double the cost of the thermal enhancement and that CH2M Hill believed that removing the source in the loess along with the fluvial SVE would reduce concentrations as needed. Mr. Sprinkle interjected that PCA concentrations were low in the fluvial aquifer. So, if the flux from the loess was removed, then concentrations in the fluvial aquifer should stay low and it was not cost effective to spend several million more dollars to remove a few hundred pounds of contaminants; especially without much confidence that system enhancements would achieve the PCA RGs. Mr. Sprinkle suggested that CH2M Hill could prepare a model to show the basis for the anticipated SVE results. Mr. Perlmutter indicated that CH2M Hill would do more analysis to develop a response to the comment. Mr. Ballard requested that CH2M Hill send the comment responses as soon as developed instead of sending the entire document, and that he would submit the responses to ORD.

The team then discussed EPA ORD comments regarding the potential use of Electrical Resistive Heating (ERH) and that metal objects potentially buried on Dunn Field that could affect the electricity conductivity during operation of the loess thermal action as the metal objects could attract the electrical current. Mr. Ballard said that Ms. Davis was not concerned about stainless steel pipe casings and other known metal objects as the thermal vendors knew how to work around them. However, unknown buried metal objects could present a problem. It was not so much an issue for In-Situ Thermal Desorption. Mr. Holmes commented that a geophysical survey was conducted as part of the Disposal Sites Pre-Design Investigation, so CH2M Hill should review the geophysics information and provide the results to the vendors.

AI: CH2M Hill to re-visit the Disposal Sites Pre-Design Investigation Technical Memorandum for information on potential buried metal objects that should be addressed.

The team then discussed issues related to the RA soil sampling procedures. Mr. Perlmutter explained that the sampling procedure would be expanded in the Performance Standards Verification Plan (PSVP) to provide for biased sampling based upon contamination hot spots and where temperatures indicate. Mr. Ballard said that sampling should focus on areas that were heated the least. Mr. Ballard requested that the PSVP reproduce the sampling protocols.

Mr. Spann voiced concern about the assumptions made to guide the SARD as they relied heavily on the presence of a PRB downgradient of Dunn Field and the elimination of the some sources from the treatment areas. He questioned if concentrations greater than 50 ppb would still be treated without the PRB. Mr. Sprinkle responded that CH2M Hill assumed that the bio-barrier and EBT injections would accomplish the same objectives and have the same effectiveness as the ZVI PRB and ZVI injections. The EBT treatment zones would be designed to treat concentrations greater than 50 ppb, and MNA would treat the remaining concentrations.

Mr. Spann requested clarification about the operational time for the loess thermal system as the SARD stated that that the system would operate for a period of time and would then be turned off. He asked if there was a plan to allow for the system to be turned back on in order to meet the soil RGs for PCA as called for in the ROD. The team discussed the issue of meeting the PCA RGs and how to word the statement of work to ensure that the contractors have all the information and can reach those goals. Mr. Spann indicated that there must be a contingency plan within the SARD in the event that the loess thermal system did not achieve the soil RGs within the time period currently stated.

Mr. Ballard reminded that team that in order to change the RGs stated in the ROD, there must be sufficient empirical data that indicated the effort had been made to achieve the RGs with the approved remedy and that it would not be attainable in a cost or time effective manner. Then with that data, DLA could approach the regulators to either change the remedy or change the RGs. Mr. Perlmutter indicated that the SARD (page 134) provided contingency planning for additional action in the event the thermal system did not achieve the RGs, and that CH2M Hill would clarify this throughout the document.

Mr. Spann requested that CH2M Hill explicitly reference the RGs throughout the SARD.

Dunn Field Remedial Design Investigation (RDI) Technical Memorandum (TM)

Mr. Nelson reported that CH2M Hill submitted the RDI TM for internal team review, had received some comments, and would submit the document to the BCT on 11 December 2006.

Fluvial SVE System Early Implementation

Mr. Holmes reported that e^2M was working with the Air Force Center for Environmental Excellence (AFCEE) to obtain funding for the early mobilization of the fluvial SVE. He anticipated that e^2M should receive notice to proceed in February 2007. He said that it would take about two months to get all the equipment ordered, etc., and that construction mobilization would start in April. The system would start around the end of May or early June. e^2M had received funding for and would prepare an abbreviated Fluvial SVE Remedial Action Work Plan (RAWP).

Mr. Holmes indicated that well abandonment and installation of new wells would be included in the Fluvial SVE RAWP and would be conducted during fluvial SVE system mobilization. Preparation of the full SA RAWP would begin around the time CH2M Hill submitted the 100% SARD to ensure there were no more BCT issues to be resolved. He reported that funding for the full RA would be requested for late FY07.

Mr. Holmes noted that a public meeting was required to brief the community on the fluvial SVE system before mobilization based on the requirement in the National Oil and Hazardous Pollution Contingency Planning Plan (NCP) to conduct a public briefing after completion of the fluvial SVE portion of the RD and before commencement of the RA; therefore, a public meeting may be scheduled in March 2007.

Rubble/Soil Pile

Mr. Holmes indicated that the rubble pile located in Treatment Area 3 was 100 feet by 160 feet by 35 feet high at the center. The mowing contractor would remove the trees. e^2M planned to excavate the pile, spread the soil around Dunn Field, and to dispose of the rubble off-site. Mr. Ballard noted that the removal of rubble should not be included in the RA cost since it is not necessary for the RA.

Dunn Field Land Use Control Implementation Plan (LUCIP)

Mr. Nelson reported that CH2M Hill submitted the Dunn Field LUCIP to Mr. John De Back and Mr. Richard Wirsing, who would review the document and then coordinate the appropriate wording with EPA General Counsel, Ms. Martha Brock. Mr. Nelson submitted the version of the LUCIP that EPA had commented upon as well as the EPA comments. He indicated that this could delay completion of the SARD.

AI: Mr. Nelson to call Mr. De Back to check on status of the LUCIP and to request that they expedite this action. Mr. Ballard to coordinate with Ms. Martha Brock.

Dunn Field Off-Depot Groundwater Remedial Design (RD)

PRB Implementation Study TM

Mr. Nelson reported that CH2M Hill had submitted the PRB TM for internal team review and would submit the document to the BCT on 11 December 2006.

Preliminary Design Parameters

Mr. Nelson reported that CH2M Hill had looked at the applicability of bioremediation to PCA, but that there was not a lot of published data are available for PCA because it is not as common as Tetrachloroethene (PCE) and Trichloroethene (TCE). Mr. Nelson presented a summary of the available published information.

He presented information from a United States Geological Survey (USGS) field study that indicated some microbes had been identified that degraded chlorinated solvents including PCA through its daughter products. Interestingly USGS had not identified the species of these degraders in biological cultures.

The team discussed the impact of this information on the Off-Depot Groundwater RD. Mr. Nelson concluded that the point of the discussion was that the most persistent daughter product of PCA would be vinyl chloride. Mr. Ballard interjected that RAB Member Mr. Torrence Myers of Memphis Light Gas and Water (MLGW) would be very interested in how to accomplish the complete degradation pathway especially as it related to the vinyl chloride. The RD presentation must clearly show how the vinyl chloride would be degraded.

Mr. Sprinkle responded that there may be two parts to the Off-Depot Groundwater RD to ensure the different type of microbes were energized for full degradation of the PCA. One could be injecting or developing the presence of the dehalococcoides; the other part would be to space treatment lines far enough apart so that the fluvial would return to aerobic conditions since vinyl chloride degraded in an aerobic environment. Mr. Nelson presented this information to highlight the need to obtain additional information about the conditions needed in the fluvial aquifer west of Dunn Field to propagate and sustain these microbes in order to fully degrade PCA.

Additional Investigation West of Dunn Field

Mr. Carlson summarized his groundwater model presentation from the September BCT meeting with emphasis on the conceptual model of the permeability of the fluvial and intermediate aquifers. He also further addressed the potential locations for suspected windows in the aquifers that allowed groundwater to move from the fluvial into the Memphis Sand aquifer.

According to Mr. Nelson, CH2M Hill proposed conducting a groundwater investigation to address the uncertainties of the intermediate aquifer as there were limited data from the intermediate aquifer and to address uncertainties regarding the treatment of PCA using EBT. The investigation would also be useful to address questions about why the plume was as small as it was given the groundwater flow velocity and assuming contamination transport for 50 years. The team also discussed the head differences between the fluvial and the intermediate aquifers and the potential affects of this on plume movement.

Mr. Nelson said that the goal of the investigation would be to provide more sustenance to and gain greater acceptance of the groundwater model. CH2M Hill proposed installing and sampling up to six additional monitoring wells in the intermediate aquifer, aquifer testing, obtaining regional information about the Memphis Sand aquifer from TDEC and MLGW, re-calibrating the Dunn Field flow model based on the data collected, and performing a desktop evaluation of the reductive dechlorination potential in the off-Depot plume. The data would provide geological characterization, understanding of contamination (if any) in the intermediate aquifer, and an approximation of the flow direction in the intermediate aquifer.

He indicated that the wells would be installed along the edge of the plume instead of the middle to limit the potential for cross-contamination from the fluvial aquifer to the intermediate aquifer.

Mr. Ballard suggested installing wells that would be associated with existing fluvial aquifer wells in order to perform pump tests. The team discussed existing monitoring well locations and the reasons for the proposed intermediate well locations. Mr. Ballard suggested installing one intermediate well in the higher concentration area near MW155 for future monitoring purposes. Mr. Holmes noted that the wells should be spaced to allow for triangulation. Mr. Miller noted, and the team agreed, that no well should be installed in an area with the potential for a DNAPL source.

CH2M Hill also proposed studying the enhanced reductive dechlorination of PCA by collecting soil samples from fluvial aquifer for microbial community analysis, running a bench scale test using a culture being grown by GeoSyntec, and looking at PCA degradation rates and products. The soil sampling would include an evaluation for the presence of dehalococcoides to determine if EBT was necessary in the beginning or if it could be delayed.

Based on this meeting's discussion, CH2M Hill would develop a brief work plan with field work to commence at the first of the year. Mr. Nelson indicated that the study results would be presented in a TM that would be on a parallel path with the Off-Depot Groundwater RD. Mr. Railey indicated that there was funding in place for some of the work and that he was working to obtain the additional funding.

Mr. Holmes mentioned that this study would not provide any additional information about the assumed windows. Mr. Sprinkle responded that the study was necessary because of uncertainties about why no contamination in the fluvial reached the windows and that the data would provide greater understanding of how and where the groundwater was moving. Mr. Carlson also indicated that the hydraulic flow information to be obtained would provide greater insight into the relationship between the intermediate and fluvial aquifers.

Request for Extension Letter

Mr. Holmes reported that e^2M submitted the draft Request for Extension of the Off-Depot Groundwater RD Letter to the BCT and had received comments. He had revised the letter to include the dates that were affected by the extension. Mr. Dobbs had asked Mr. Holmes to address the reasons behind the 170-day extension, specifically the activities being conducted during that time.

Mr. Nelson reported that the activities to be conducted during the extension were associated with the need to study and understand several aspects of PCA biogradability including degradation kinetics using the WBC-2 bench test, toxicity levels, the appropriate substrate for degradation to occur, injection well/bio-barrier spacing, effectiveness of anaerobic/aerobic enhancement, and need for/sequencing of bioaugmentation. Also, CH2M Hill needed to review the Long Term Monitoring plan with respect to the length of time to achieve MNA along the outside edge of the plume based on the groundwater model and to ensure the plan did not under or over sample.

Mr. Ballard noted that it seemed that portions, if not all, of the investigation west of Dunn Field should be completed prior to submittal of the 90% RD. Mr. Sprinkle concurred that the biological component of the Dunn Field investigation was critical to the RD. Mr. Ballard reiterated that the extension request must provide sufficient justification for the amount of time requested.

AI: CH2M Hill will develop a new date, if necessary, for submittal of the 90% Off-Depot Groundwater RD, along with a detailed summary of and timeline for activities required to

produce the Pre-Final Off-Depot Groundwater RD to include in the extension letter to e²M by 27 November 2006, and to the BCT by 1 December 2006.

Mr. Holmes stated that the schedule for the Proposed Plan and Dunn Field Record of Decision (ROD) Amendment must be closely tied to the 90% Off-Depot Groundwater RD in order to provide sufficient information to the public. The ROD Amendment must be completed and signed prior to commencement of RA activities. Mr. Ballard noted that the Proposed Plan should note that there were no changes to the Land Use Controls portion of the ROD.

Main Installation Remedial Action (MIRA)

Mr. Holmes reported that $e^{2}M$ submitted the first round of MIRA design monitoring results to Mr. Dobbs and AFCEE on 13 November 2006. He would submit the information to the BCT via email on 16 November 2006. He reported that $e^{2}M$ would collect the second round of samples this week and would conduct the full quarterly sampling in December 2006.

Mr. Holmes presented the results and reported that pH was elevated in some well locations. Mr. Ballard suggested using pH paper to validate the pH probe results as high pH was unexpected. Mr. Sprinkle noted that he would expect lower (more acidic) pH, not higher. Mr. Sprinkle recommended the LED probe as potentially useful, especially at low dissolved oxygen concentrations.

Mr. Holmes reported that sample results indicated anaerobic conditions were being created around the injection wells, although the condition was not widespread. Methanogenic conditions were also being created around the injection points but not on a widespread basis. He also reported a contaminant decrease in the injection wells but not in the monitoring wells.

Mr. Ballard reminded the team that a reduction in concentrations could be due to dilution from the injection versus degradation, especially where there was little water in a well. Mr. Holmes noted that dilution should be seen in the injection wells, but that it would not be expected in the monitoring wells.

BRAC Cleanup Plan (BCP) Version 10

Mr. Holmes distributed the current Master Schedule and reviewed several key items. He identified the documents and submittal dates that would be affected by the two Source Areas RAWPs (one for the fluvial SVE only and one for the remaining Source Areas activities) as well as the changes discussed for the Off-Depot Groundwater investigation and RD.

He indicated that the Main Installation activities were ahead of schedule, so the Finding of Suitability to Transfer and the Response in Place dates had been modified accordingly. The only other changes to the BCP were in Section 6.0, which presented BCT issues.

Mr. Holmes indicated that e^2M was on schedule to submit the Rev. 0 BCP Version 10 to the BCT on 1 December 2006.

AI: CH2M Hill and e²M to discuss additional schedule changes on 27 November 2006.

Soil Cuttings

Mr. Holmes reported that MACTEC and CH2M Hill supplies and soil cuttings had been transferred to e²M and had to be removed from the current warehouse. DLA would like to establish a timeframe for keeping soil cuttings, after which the soils could be discarded. The

team discussed the issue and agreed to discard soil cuttings after one year of collection. If a soil cutting was not labeled or dated, then it would be discarded immediately.

Dunn Field Property Sale

Ms. McMath received an update from Mr. Harold Duck of the Corps of Engineers – Mobile regarding General Services Administration's (GSA) actions to sell the Dunn Field FOST 4 property. She indicated that GSA had conducted open houses at Dunn Field to show it to all interested parties, had listed the property on the GSA websites, had developed and mailed a brochure to those identified as possible prospects, and had placed advertisements in three or four newspapers. Now GSA was waiting for responses, but no bids had been received yet. The first possible closing date for bids was 31 December 2006, but that depended on the degree of activity. In all probability, GSA would keep the bidding open until after that date. A more likely date for bid amounts. The Department of Army would determine when to close the bidding process after reviewing the bids.

Next Meeting

The next BCT meeting was tentatively scheduled for 18 January 2006 in Atlanta, GA.

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